

217/785-1705

CONSTRUCTION PERMIT -- REVISED

PERMITTEE

Dana Sealing Manufacturing, LLC
Attn: Bob Cole, Environmental Manager
1201 Victor Dana Road
Robinson, Illinois 62454

Application No.: 09020047

I.D. No.: 033808AAG

Applicant's Designation:

Date Received: November 7, 2014

Subject: Soil Vapor Extraction System

Date Issued: December 11, 2014

Location: 1201 Victor Dana Road, Robinson

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of an in-situ soil vapor extraction system, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a.
 - i. This permit authorizes construction of an in-situ soil vapor extraction system (the affected system) that will be used for further soil remediation at the area at the source that has already undergone groundwater remediation. Vapor extraction wells will be installed for applying vacuum to the contaminated soil within the area with selected wells periodically used for air injection to promote air flow.
 - ii. This revised permit authorizes the catalytic oxidizer that was originally required for control of emissions of organic material from the affected system to be permanently removed from service. This change reflects the continuing reduction in the levels of organic compounds in the vapor that is extracted by this system. These levels are now a fraction of those in 2009, when this system began operation. As a result, this system can now comply with the emission limits originally set by this permit without using the oxidizer.
- b. This permit only authorizes the treatment of extracted vapor due to the affected system's operation for in-situ treatment of soil that is in its original location and will remain in that location following treatment, except for soil displaced from drilling wells, which must be appropriately handled.
2. This permit is issued based on in-situ treatment of soils that are only contaminated with volatile and semi-volatile organic materials.

Note: Soils classified as hazardous waste pursuant to Section 3.15 of the Illinois Environmental Protection Act (Act) can not be treated without written approval from the Illinois EPA, Bureau of Land,

including permits in accordance with Section 21(f) of the Act. The Permittee must make the determination that the soil to be treated is non-hazardous using the criteria under 35 IAC 721.111.

3. Condition 3 has been removed in this revised permit. (In the initial permit, this condition originally operation of the catalytic oxidizer.)
- 4a. Emissions of volatile organic material (VOM) from the affected system shall not exceed 1.1 lbs/hour and 4.8 tons/year.
- 5a.
 - i. Operation of the affected system is subject to 35 IAC 212.301, which provides that no person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the source.
 - ii. Operation of the affected system is subject to 35 IAC 212.123, which provides that no person shall cause or allow any visible emissions of particulate matter from any emission unit with an opacity greater than 30 percent. The emission of particulate matter may be greater than 30 percent, but no greater than 60 percent for a period or periods aggregating no more than 8 minutes in any 60 minute period with no more than 3 such periods in a 24 hour period provided such emissions occur from only one emission unit within 1000 feet.
 - iii. The affected system is subject to 35 IAC 212.321, which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced on or after April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321. [35 IAC 212.321(a)]
6. This Permit is issued based on the emissions of hazardous air pollutants (HAPs) from the affected system being less than 3.6 tons per year of any single HAP and 3.6 tons per year of any combination of HAPs.
7. This permit is issued based on the affected system not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Site Remediation, 40 CFR 63 Subpart GGGGG, pursuant to 40 CFR 63.7881(a). This is because the project is not located at a source with one or more other operations that emit HAP and meet an affected source definition specified for a source category that is regulated by another subpart under 40 CFR Part 63 and therefore, meets the exemption under 40 CFR 63.7881(a). (Under this exemption, an operation is considered to meet the definition for an affected source regardless of whether or not the operation is subject to standards under 40 CFR Part 63.)

- 8a. The affected system shall be operated in accordance with good air pollution control practice to minimize emissions.
 - b. In the event that the operation of the affected system and any associated activities results in an odor nuisance, the Permittee shall take all appropriate and necessary actions, including but not limited to, reduction in the operating rate, in order to eliminate the nuisance.
9. The Permittee shall maintain records of the following items:
- a. Condition 9(a) has been removed in this revised permit. (In the original permit, this condition required certain records related to the catalytic oxidizer.)
 - b.
 - i. Operating hours of the affected system (hours/month); and
 - ii. Results of VOM and speciated HAP sampling.
 - c. The following records for the operation and maintenance of the affected system:
 - i. An operating log or other records for the affected system that at a minimum shall address:

Any unusual occurrences during each malfunction of the affected system that significantly impairs emission performance, including the nature and duration of the event, corrective actions taken, any deviations from the established procedures for such a malfunction, and preventative actions taken to address similar events.
 - ii. Inspection, maintenance and repair log(s) for the affected system that at a minimum shall identify such activities that are performed related to components that may affect emissions; the reason for such activities, i.e., whether planned or initiated due to a specific event or condition; and any failure to carry out the established maintenance procedures, with explanation.
 - d. Records for any period during which the affected system deviated from an applicable requirement.
 - e. Records of the VOM and HAP emissions of the affected system (tons/month and tons/year), with supporting calculations.
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able

to respond to an Illinois EPA request for records during the course of a source inspection.

11. The Permittee shall notify the Illinois EPA of deviations of the affected system from the requirements of this permit in a quarterly report. For each such incident, these reports shall provide a description of the incident (including date and duration), the probable cause of the incident and the corrective actions that were taken.
12. Two copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

13. The Permittee is allowed to operate the affected system without the catalytic oxidizer, as addressed by this revised construction permit, pursuant to this revised permit until a new or revised operating permit is issued for this source provided that, within 45 days of the date that the catalytic oxidizer is permanently removed from service, the Permittee submits a supplement to its pending application for renewal of the operating permit for the source to address this new mode of operation of the affected system. This condition supersedes Standard Condition 6.

If you have any questions on this permit, please contact David Taylor at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:DKT:psj

cc: Region 3